

**LABATON SUCHAROW LLP**  
Thomas A. Dubbs  
Carol C. Villegas  
Jeffrey A. Dubbin (SBN 287199)  
140 Broadway  
New York, New York 10005

*Lead Counsel to Lead Plaintiff and the  
Proposed Class*

**MICHELSON LAW GROUP**  
Randy Michelson (SBN 114095)  
220 Montgomery Street, Suite 2100  
San Francisco, California 94104

*Bankruptcy Counsel to Lead Plaintiff  
and the Proposed Class*

**LOWENSTEIN SANDLER LLP**  
Michael S. Etkin (*pro hac vice*)  
Andrew Behlmann (*pro hac vice*)  
One Lowenstein Drive  
Roseland, New Jersey 07068

*Bankruptcy Counsel to Lead Plaintiff  
and the Proposed Class*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

☒ Affects Both Debtors  
☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**NOTICE OF APPEAL AND STATEMENT OF  
ELECTION TO HAVE APPEAL HEARD BY  
DISTRICT COURT**

1 NOTICE IS HEREBY GIVEN that Public Employees Retirement Association of New  
2 Mexico (“**Securities Lead Plaintiff**”), the court-appointed lead plaintiff in the securities class  
3 action captioned as *In re PG&E Corporation Securities Litigation*, Case No. 18-03509 (the  
4 “**Securities Litigation**”) pending in the United States District Court for the Northern District of  
5 California, on behalf of itself and the proposed class it represents in the Securities Litigation,  
6 together with York County on behalf of the County of York Retirement Fund, City of Warren  
7 Police and Fire Retirement System, and Mid-Jersey Trucking Industry & Local No. 701 Pension  
8 Fund (collectively with Securities Lead Plaintiff, “**Securities Plaintiffs**”), hereby appeals from  
9 the *Order Confirming Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of*  
10 *Reorganization Dated June 19, 2020* entered on June 20, 2020 [ECF No. 8053] (the  
11 “**Confirmation Order**”), solely to the extent of seeking review of that part of the Confirmation  
12 Order approving the Insurance Deduction<sup>1</sup> with respect to the formula for the determination of  
13 HoldCo Rescission or Damage Claims. Copies of the transcript of the June 19 Hearing wherein  
14 the Bankruptcy Court issued its ruling with respect to the Insurance Deduction and the  
15 Confirmation Order are attached hereto as **Exhibit A** and **Exhibit B** respectively.

16  
17  
18 Pursuant to 28 U.S.C. § 158(c) and Bankruptcy Rule 8005(a), Securities Plaintiffs elect to  
19 have their appeal from the oral ruling at the June 19 Hearing and Confirmation Order, limited to  
20 the Insurance Deduction, heard by the United States District Court for the Northern District of  
21 California rather than by the Bankruptcy Appellate Panel for the Ninth Circuit.

22 The names of all parties to the Confirmation Order other than Lead Plaintiff, and the  
23 names, addresses, and telephone numbers of their respective attorneys, are:  
24  
25

---

26 <sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the *Debtors’*  
27 *and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020*  
28 [ECF No. 8048].

Party	Counsel
Debtors	<p>WEIL, GOTSHAL &amp; MANGES LLP  Stephen Karotkin (<i>pro hac vice</i>)  Theodore E. Tsekerides (<i>pro hac vice</i>)  Richard W. Slack (<i>pro hac vice</i>)  Jessica Liou (<i>pro hac vice</i>)  Matthew Goren (<i>pro hac vice</i>)  767 Fifth Avenue  New York, NY 10153-0119  Telephone: 212 310 8000  Fax: 212 310 8007  stephen.karotkin@weil.com  theodore.tsekerides  richard.slack@weil.com  jessica.liou@weil.com  matthew.goren@weil.com</p> <p>KELLER BENVENUTTI KIM LLP  Tobias S. Keller (#151445)  Jane Kim (#298192)  650 California Street, Suite 1900  San Francisco, CA 94108  Telephone: 415 496 6723  Fax: 650 636 9251  tkeller@kbkllp.com  jkim@kbkllp.com</p>
Shareholder Proponents	<p>JONES DAY  Bruce S. Bennett (SBN 105430)  Joshua M. Mester (SBN 194783)  James O. Johnston (SBN 167330)  555 South Flower Street  Fiftieth Floor  Los Angeles, CA 90071-2300  Telephone: 213 489 3939  Fax: 213 243 2539  bbennett@jonesday.com  jmester@jonesday.com  jjohnston@jonesday.com</p>

1 Dated: July 2, 2020

**LOWENSTEIN SANDLER LLP  
MICHELSON LAW GROUP**

2 By: /s/ Randy Michelson  
3 Randy Michelson (SBN 114095)

4 *Bankruptcy Counsel to Lead Plaintiff and the Class*

5 - and -

6 **LABATON SUCHAROW LLP**

7 *Lead Counsel to Lead Plaintiff and the Class*

8 - and -  
9

10 **WAGSTAFFE, VON LOEWENFELDT, BUSCH  
& RADWICK, LLP**

11 *Liaison Counsel for the Class*

12 - and -  
13

14 **ROBBINS GELLER RUDMAN & DOWD LLP**

15 *Counsel for the Securities Act Plaintiffs*

16 - and -

17 **VANOVERBEKE, MICHAUD & TIMMONY,  
18 P.C.**

19 *Additional Counsel for the Securities Act Plaintiffs*